

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 7
	)	
Outfox Hospitality LLC,	)	Case No. 24-11008 (TMH)
	)	
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Outfox Hospitality Midco LLC,	)	Case No. 24-11009 (TMH)
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Doms Market LLC,	)	Case No. 24-11010 (TMH)
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Doms Market Holdco Inc.,	)	Case No. 24-11011 (TMH)
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Foxtrot Intermediate Texas, Incorporated,	)	Case No. 24-11012 (TMH)
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Foxtrot Holdings Texas, Incorporated,	)	Case No. 24-11013 (TMH)
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Foxtrot Retail Incorporated,	)	Case No. 24-11014 (TMH)
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Foxtrot Retail DC, LLC,	)	Case No. 24-11015 (TMH)
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Foxtrot Retail Florida, LLC,	)	Case No. 24-11016 (TMH)
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Foxtrot Retail Texas, Incorporated,	)	Case No. 24-11017 (TMH)
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Foxtrot Ventures, Incorporated,	)	Case No. 24-11018 (TMH)
	)	
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Debtors.	)	

**MOTION OF THE CHAPTER 7 INTERIM TRUSTEE FOR  
ENTRY OF AN ORDER AUTHORIZING JOINT ADMINISTRATION  
PURSUANT TO BANKRUPTCY RULE 1015 AND LOCAL RULE 1015-1**

Jeffrey L. Burtch, Chapter 7 Interim Trustee for the bankruptcy estates (the “Estates”) of  
Outfox Hospitality LLC, Outfox Hospitality Midco LLC, Doms Market LLC, Doms Market

Holdco Inc., Foxtrot Intermediate Texas, Incorporated, Foxtrot Holdings Texas, Incorporated, Foxtrot Retail Incorporated, Foxtrot Retail DC, LLC, Foxtrot Retail Florida, LLC, Foxtrot Retail Texas, Incorporated, Foxtrot Ventures, Incorporated (the “Debtors”), moves for the entry of an order authorizing joint administration of these Chapter 7 Estates (the “Motion”), and in support of this Motion respectfully represents that:

### **JURISDICTION**

1. The Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are Bankruptcy Rule 1015 and Local Rule 1015-1.

### **BACKGROUND**

3. On May 14, 2024, the debtors Outfox Hospitality LLC, Outfox Hospitality Midco LLC, Doms Market LLC, Doms Market Holdco Inc., Foxtrot Intermediate Texas, Incorporated, Foxtrot Holdings Texas, Incorporated, Foxtrot Retail Incorporated, Foxtrot Retail DC, LLC, Foxtrot Retail Florida, LLC, Foxtrot Retail Texas, Incorporated, Foxtrot Ventures, Incorporated filed voluntary petitions for relief under Chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”).

4. On May 15, 2024, Jeffrey L. Burtch was appointed as interim trustee for all the Debtors (“Trustee”), pursuant to Section 701 of the Bankruptcy Code.

### **RELIEF REQUESTED**

5. By this Motion, the Trustee seeks the entry of an order, pursuant to Bankruptcy Rule 1015 and Local Rule 1015-1, jointly administering the Debtors' Chapter 7 cases for

procedural purposes only. Upon information and belief, the above-captioned Debtors are affiliates within the meaning of Section 101(2) of the Bankruptcy Code. Accordingly, the Court has the authority to grant the relief requested in this Joint Administration Motion. *See Declaration in Support of Motion of the Chapter 7 Trustee for Entry of an Order Authorizing Joint Administration Pursuant to Bankruptcy Rule 1015 and Local Rule 1015-1.*

6. Many of the motions, applications, hearings and orders that will arise in the Chapter 7 cases will jointly affect each Debtor. For this reason, the Trustee respectfully submits that the interests of the Debtors, their creditors and other parties in interest would be best served by the joint administration of the Chapter 7 cases. To optimally and economically administer the Debtors' pending Chapter 7 cases, such cases should be jointly administered, for procedural purposes only, under the case number assigned to Outfox Hospitality LLC.

7. The Trustee also requests that the Clerk of the Court maintain one file and one docket for all of the Chapter 7 cases, which file and docket shall be the file and docket for 24-11008 (TMH).

8. The Trustee furthers request that the caption of these Chapter 7 cases be modified as follows to reflect their joint administration:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 7
Outfox Hospitality LLC, <i>et al.</i> <sup>1</sup> ,	)	Case No. 24-11008 (TMH)
	)	
Debtors.	)	(Jointly Administered)

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<sup>1</sup> The Debtors in these chapter 7 cases, along with each Debtor's bankruptcy case number, are Outfox Hospitality LLC, Bk. No. 24-11008 (TMH); Outfox Hospitality Midco LLC, Bk. No. 24-11009 (TMH); Doms Market LLC, Bk. No. 24-11010 (TMH); Doms Market Holdco Inc., Bk. No. 24-11011 (TMH); Foxtrot Intermediate Texas, Incorporated, Bk. No. 24-11012 (TMH); Foxtrot Holdings Texas, Incorporated, Bk. No. 24-11013 (TMH); Foxtrot Retail Incorporated, Bk. No. 24-11014 (TMH); Foxtrot Retail DC, LLC, Bk. No. 24-11015 (TMH); Foxtrot Retail Florida, LLC, Bk. No. 24-11016 (TMH); Foxtrot Retail Texas, Incorporated, Bk. No. 24-11017 (TMH); Foxtrot Ventures, Incorporated, Bk. No. 24-11018 (TMH).

9. In addition, the Trustee seeks the Court's direction that a separate docket entry is made on the docket of Outfox Hospitality Midco LLC, Bk. No. 24-11009 (TMH); Doms Market LLC, Bk. No. 24-11010 (TMH); Doms Market Holdco Inc., Bk. No. 24-11011 (TMH); Foxtrot Intermediate Texas, Incorporated, Bk. No. 24-11012 (TMH); Foxtrot Holdings Texas, Incorporated, Bk. No. 24-11013 (TMH); Foxtrot Retail Incorporated, Bk. No. 24-11014 (TMH); Foxtrot Retail DC, LLC, Bk. No. 24-11015 (TMH); Foxtrot Retail Florida, LLC, Bk. No. 24-11016 (TMH); Foxtrot Retail Texas, Incorporated, Bk. No. 24-11017 (TMH); Foxtrot Ventures, Incorporated, Bk. No. 24-11018 (TMH), substantially as follows:

An order has been entered in these cases directing the joint administration for procedural purposes only of the Chapter 7 cases of Outfox Hospitality LLC, Outfox Hospitality Midco LLC, Doms Market LLC, Doms Market Holdco Inc., Foxtrot Intermediate Texas, Incorporated, Foxtrot Holdings Texas, Incorporated, Foxtrot Retail Incorporated, Foxtrot Retail DC, LLC, Foxtrot Retail Florida, LLC, Foxtrot Retail Texas, Incorporated, Foxtrot Ventures, Incorporated. The main case docket of Outfox Hospitality LLC, Bk. No. 24-11008 (TMH) should be consulted for all matters affecting these cases.

#### **BASIS FOR RELIEF REQUESTED**

10. Pursuant to Bankruptcy Rule 1015(b), if two or more petitions are pending in the same court by or against a debtor and an affiliate, "the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b)(4). Local Rule 1015-1 similarly provides for joint administration of Chapter 7 cases when the facts demonstrate that joint administration "is warranted and will ease the administrative burden for the Court and the parties." Del. Bankr. L.R. 1015-1.

11. The joint administration of the Chapter 7 cases will permit the Clerk of the Court to utilize a single docket for all of the cases and to combine notices to creditors and other parties in interest in the Debtors' respective cases. In addition, there will likely be numerous motions,

applications, and other pleadings filed in the Chapter 7 cases that will affect all Debtors. Joint administration will permit counsel for all parties in interest to include all Debtors' Chapter 7 cases in a single caption for the numerous documents that are likely to be filed and served in these cases. Joint administration will also enable parties in interest in each of the Chapter 7 cases to stay apprised of all the various matters before the Court.

12. Joint administration of the Chapter 7 cases will not prejudice or adversely affect the rights of the Debtors' creditors because the relief sought herein is purely procedural and is not intended to affect substantive rights. Because the Chapter 7 cases involves eleven (11) Debtors, joint administration will significantly reduce the volume of paper that otherwise would be filed with the Clerk of this Court, render the completion of various administrative tasks less costly and minimize the number of unnecessary delays. Moreover, the relief requested by this Motion will also simplify supervision of the administrative aspects of these cases by the Office of the United States Trustee.

13. Finally, the entry of joint administration orders in related cases such as these is common in this District and elsewhere. An order of joint administration relates to the routine administration of a case and may be entered by the Court in its sole discretion.

14. For these reasons, the Trustee submits that the relief requested herein is in the best interests of the Debtors, their Estates and creditors, and therefore should be granted.

WHEREFORE, the Trustee respectfully requests that the Court grant the relief requested in this Motion and such other and further relief as is just and proper.

Dated: May 20, 2024

/s/ Jeoffrey L. Burtch  
Jeoffrey L. Burtch, Esquire  
Chapter 7 Panel Trustee  
P. O. Box 549  
Wilmington, DE 19899  
Telephone: (302) 472-7427  
[jburtch@burtchtrustee.com](mailto:jburtch@burtchtrustee.com)